

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

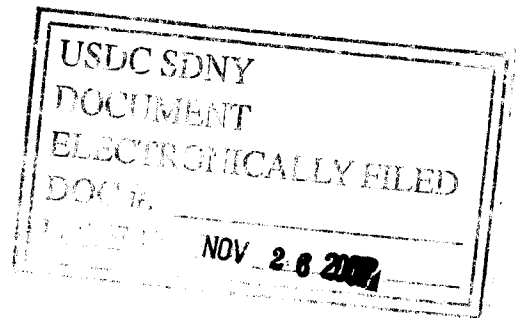
ABDUL ALQUASSIM,
a/k/a "Alberto,"

Defendant.

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INFORMATION

S9.05 Cr. 523 (LTS)



COUNT ONE

The United States Attorney charges:

1. From in or about 2004 up to and including August June 2007, in the Southern District of New York and elsewhere, ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, would and did import into the United States from a place outside thereof 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, in a form commonly referred to as "hashish," a tetrahydrocannabinols, in violation of Sections 812, 952(a), and 960(b)(2) of Title 21, United States Code.

3. It was a further part and object of the conspiracy that ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, would and did import into the United States

from a place outside thereof, mixtures and substances containing a detectable amount of cathinone, in a form commonly known as "khat," in violation of Sections 812, 952(a), and 960(b)(3) of Title 21, United States Code.

(Title 21, United States Code, Section 963.)

COUNT TWO

The United States Attorney further charges:

4. From in or about 2004 up to and including in or about June 2007, in the Southern District of New York and elsewhere, ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and object of said conspiracy that ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly would and did distribute and possess with intent to distribute a controlled substance, to wit, 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, in a form commonly referred to as "hashish," a tetrahydrocannabinols, in violation of Sections 812, 841(a)(1) and 841(b)(1)(B) of Title 21 of the United States Code.

6. It was a further part and object of said conspiracy that ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, and others known and unknown, unlawfully, intentionally, and

knowingly would and did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cathinone, in a form commonly known as "khat," in violation of Sections 812, 841(a)(1) and 841(b)(1)(C) of Title 21 of the United States Code.

(Title 21, United States Code, Section 846.)

COUNT THREE

The United States Attorney further charges:

7. In or about 2004, in the Southern District of New York and elsewhere, ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, unlawfully, willfully, and knowingly and with intent to defraud, did produce and use and traffic in one and more counterfeit access devices, to wit, the defendant aided and abetted access device fraud through his purchase of an item which had been previously purchased using a counterfeit credit card without the authorization of the true credit card holder.

(Title 18, United States Code, Sections 1029(a)(1) and 2.)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Information, ABDUL ALQUASSIM, a/k/a "Alberto," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting and derived from any proceeds that the said defendant obtained directly and indirectly as a result of the

said violation and any and all property used and intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Information including, but not limited to, a sum of money equal to approximately \$10 million in United States Currency, representing the amount of proceeds obtained as a result of the controlled substance offense for which the defendants are liable.

Substitute Assets Provision

9. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;
- or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)

A handwritten signature in black ink, appearing to read "Michael J. Garcia", is written over a horizontal line.

MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. §§ 963 and 846; 18 U.S.C. §§
1029(a)(1) and 2.)

MICHAEL J. GARCIA
United States Attorney.
